Industrial Stormwater General Permit

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What Should the New Permit Do, and What Should it all Mean?

Appeal Considerations

- Appeal of PCHB ruling
- "Jury is still out"
 - Mixing Zones
 - Compliance Schedules
 - Monitoring Requirements
- Settlement agreements in effect

Goals of ISWGP

- Broadly Applicable
- Efficient
- Feasible
- Effective
- Enforceable
- Simple
 - K.I.S.S.

Goals of ISWGP

- B roadly Applicable
- E fficient

- F easible
- E ffective
- E nforceable
- S imple

Tools of the ISWGP

- Mixing Zones
- Compliance Schedules
- BMPs
- Reasonable Sampling & Monitoring Req.
- Dispute Resolution Process

Implementation Issues / Concerns

- Inspector Over-interpretation
- Fees consistent with service
- Integration between industrial and municipal permits
- Phase II
- Non-Point Sources
- Flow considerations
- Sampling Requirements

The End

